

**FILED**  
HARRISBURG, PA

AUG 03 2016

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** ) **Crim No. 1:16-CR-214**  
 )  
 **v.** ) *Chief*  
 ) **(Judge Conner)** )  
 )  
 **MOHAMMED RIZK** )

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

Beginning on or about October 14, 2014, up to and including February 10, 2016, in Dauphin County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendant,

**MOHAMMED RIZK,**

knowingly converted to his own use money of the United States in excess of \$1,000, that is, approximately \$67,003. 00 in benefits and payments under the Social Security Administration's Retirement and Survivor's Insurance (RSI) Program that he was ineligible to receive.

All in violation of Title 18, United States Code, Sections 641.

**THE GRAND JURY FURTHER CHARGES THAT:**

**COUNT TWO**

Beginning on or about October 14, 2014, up to and including February 10, 2016, in Dauphin County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendant,

**MOHAMMED RIZK,**

having made application to receive Retirement and Survivor's Insurance (RSI) program payments for the use and benefit of his children, K.R. and S.R., and having received such payment, knowingly and willfully converted such payments to a use other than for the use and benefit of such other persons. Specifically, while acting as representative payee for his children's and his RSI payments, defendant **MOHAMMED RIZK** converted to his own use RSI payments made to him after the death of his wife, Lori Rizk, and by such action obtained approximately \$67,003.00 in RSI payments to which he was not entitled.

All in violation of Title 42, United States Code, § 408 (a) (5).

**THE GRAND JURY FURTHER CHARGES THAT:**

**COUNT THREE**

On or about October 8, 2014, in Dauphin County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendant,

**MOHAMMED RIZK,**

knowingly made and caused to be made any false statement or representation of a material fact in any application for any payment or for a disability determination under the United States Social Security Administration's (SSA) Retirement and Survivor's Insurance (RSI) program in that the defendant, when applying for benefits under the RSI program, made the false statement and representation that all of the eligible children were living with him, said statement and representation having been made in order for the defendant to collect RSI program benefits he was not entitled to receive.

All in violation of Title 42, United States Code, § 408 (a) (2).

**FORFEITURE ALLEGATION**

The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 641 set forth in Count 1 of this Indictment, the defendant,

**MOHAMMED RIZK,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, including, but not limited to:

a. \$67,003.00 in United States currency.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a

third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a) (1) (C) and 28 U.S.C. § 2461.

A TRUE BILL



Grand Jury Foreperson

8-3-2016

PETER J. SMITH  
United States Attorney



WILLIAM A. BEHE  
Assistant United States Attorney

Dated: 8-3-16